

HARRIS BEACH PLLC
ATTORNEYS AT LAW

April 8, 2019

THE OMNI
333 EARLE OVINGTON BLVD., SUITE 901
UNIONDALE, NY 11553
(516) 880-8492

STEPHANIE L. TANZI, ESQ.
STANZI@HARRISBEACH.COM

Via ECF

Hon. Joanna Seybert
United States District Court
Eastern District of New York
Long Island Federal Courthouse
100 Federal Plaza
P.O. Box 9014
Central Islip, New York 11722-9014

Re: Joseph Jackson v. Nassau County, et. al
Docket No.: 18-cv- 3007

Dear Judge Seybert:

Our office represents the Defendants, Incorporated Village of Freeport, the Village of Freeport Police Department and individual employees of the Village named as defendants in the above subject litigation (hereinafter referred to as the "Village Defendants.") This correspondence is submitted as a letter motion requesting that the time by which the parties must submit dispositive motions be extended from April 9, 2019 up to and including May 9, 2019. The reason for this request is the Amended Complaint still fails to identify the employment of the individual defendants thereby requiring further investigation to ensure representation is properly put before the Court for each individual defendant. Additionally, the undersigned requests additional time to review with our client the voluminous documentation recently received in this matter.

The request is on consent of all parties. This is the first request for the relief requested herein.

As always, I appreciate the court's assistance in this matter. If the Court has any questions, our office will coordinate a telephone conference at the Court's convenience.

HARRIS BEACH PLLC
Attorneys for the Village Defendants

s/ *Stephanie L. Tanzi*

Stephanie L. Tanzi
333 Earle Ovington Blvd., Suite 901
Uniondale, New York 11553
(516)880-8484

cc: **VIA ECF**

Harvis & Fett LLP
305 Braodway, 14th Floor
New York, New York 10007
Attn: Gabriel P. Harvis, Esq.

Wilson, Elser, Moskowitz, Edelman & Dicker, LLP
1133 Westchester Avenue
White Plains, New York 10604
Attn: Peter A. Meisels, Esq.
Allison M. Holubis, Esq.